

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

RACHEL MILLER; TEXAS DEMOCRATIC
PARTY; DNC SERVICES CORP., d/b/a
DEMOCRATIC NATIONAL COMMITTEE;
DSCC; and DCCC,

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as the
Texas Secretary of State,

Defendant.

Civil Action No. 1:19-cv-01071

**DECLARATION OF ELISABETH C. FROST IN SUPPORT OF PLAINTIFFS’
APPLICATION FOR PRELIMINARY INJUNCTION**

I, Elisabeth C. Frost, hereby declare as follows:

1. I am over 18 years of age and am competent to make this declaration. I am a partner with the law firm of Perkins Coie LLP, and am admitted to practice law in the District of Columbia, the State of New York, and multiple federal district and appellate courts, as well as the U.S. Supreme Court. I admitted in this case *pro hac vice* and represent Plaintiffs in the above-captioned matter. I submit this declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs’ Application for Preliminary Injunction.

2. Attached as Exhibit A is a true and correct copy of the Declaration of Lucinda Guinn, the Executive Director of Plaintiff DCCC, dated November 15, 2019.

3. Attached as Exhibit B is a true and correct copy of the Declaration of Tommy Glen Maxey, senior advisor to the Chairman of Plaintiff Texas Democratic Party, dated November 15, 2019.

4. Attached as Exhibit C is a true and correct copy of the Expert Report of Dr. Jonathan Rodden, dated November 14, 2019, along with a copy of Dr. Rodden's curriculum vitae (attached thereto as Appendix B).

5. Attached as Exhibit D is a true and correct copy of the Expert Report of Dr. Jon A. Krosnick, dated November 18, 2019, along with a copy of Dr. Krosnick's curriculum vitae (attached thereto as Appendix A).

6. Attached as Exhibit E is a true and correct copy of the Expert Report of Dr. Darren Grant, dated November 15, 2019, along with a copy of Dr. Grant's curriculum vitae.

7. Attached as Exhibit F is a true and correct copy of a document entitled *Candidate Certification & Ballot Drawing 2016 Primary*, prepared by the Texas Republican Party and the Texas Republican County Chairmen's Association.

8. Attached as Exhibit G is a true and correct copy of the Expert Report of Drs. James Henson and Joshua Blank, dated November 15, 2019, along with copies of their curricula vitarum.

9. Attached as Exhibit H is a true and correct copy of the Declaration of Justin Barasky, senior advisor at Plaintiff DSCC, dated November 14, 2019.

10. Attached as Exhibit I is a true and correct copy of the Declaration of Rachana Desai Martin, the Chief Operating Officer of Plaintiff DNC Services Corp., d/b/a/ Democratic National Committee, dated November 15, 2019.

11. Attached as Exhibit J is a true and correct copy of the Declaration of Plaintiff Rachel Miller, dated November 13, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 18, 2019.

/s/ Elisabeth C. Frost

Elisabeth C. Frost*
PERKINS COIE LLP
700 Thirteenth St., N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-9959
efrost@perkinscoie.com

Counsel for the Plaintiffs

**Admitted Pro Hac Vice*